

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

Melody Stoops, Plaintiff, v. Wells Fargo Bank, N.A., Defendant.	Case No. 3:15-cv-00083-KRG (JUDGE KIM R. GIBSON)
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STIPULATION AND REQUEST FOR AN ORDER RESCHEDULING ORAL ARGUMENT REGARDING THE MOTIONS FOR SUMMARY JUDGMENT

TO THE HONORABLE COURT: Plaintiff Melody Stoops (“Plaintiff”) and Wells Fargo Bank, N.A. (“Defendant”), (collectively “the Parties”), by and through their respective counsel, hereby stipulate that the oral argument currently scheduled for May 11, 2016 at 1:30 p.m. be rescheduled to May 25, 2016 at 1:30 p.m., and request that the Court enter an order rescheduling the oral argument to May 25, 2016 at 1:30 p.m., good cause being set forth as follows:

1. WHEREAS, on April 7, 2016, the Court conducted a post-discovery status conference wherein the Court informed counsel for the Parties that should the Court schedule oral argument that it will work to accommodate counsels’ schedules, as they are all located in California. (ECF-71)

2. WHEREAS, on April 29, 2016, the Court issued an Order setting oral argument for May 11, 2016 at 1:30 p.m.. (ECF-72).

3. WHEREAS, Joseph R. Manning, counsel for Plaintiff, is currently engaged in a trial which will likely not conclude by May 11, 2016. Counsel for the Parties have met and

conferred and have agreed that May 25, 2016 is the optimal date for the Parties to conduct oral argument.

In light of the foregoing, the Parties of the above-entitled action jointly request that the Court reschedule oral argument regarding the motions for summary judgment to May 25, 2016 at 1:30 p.m.

Respectfully submitted,

DATED: May 3, 2016

By: /s/ Joseph R. Manning, Jr.
Joseph R. Manning, Jr.

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Attorneys for Plaintiff
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DATED: May 3, 2016

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CERTIFICATE OF SERVICE

Service is being effectuated upon counsel for counsel of record via the CM/ECF system.

By: /s/ Joseph R. Manning, Jr.